

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LISA SEWARD**

**CHAPTER 7**

**DEBTOR**

**CASE NO. 18-11395 JDW**

**MOTION TO AVOID LIEN**

**COME(S) NOW**, Debtor(s), by and through his/her/their attorney of record, and moves the Court, pursuant to §522(f) of the United States Bankruptcy Code, to avoid the lien of the Creditor, **Tower Loan of Horn Lake, UCC File No. 20162091488A**, on the grounds that the security in household goods for said debt is a non-possessory, non-purchase money security agreement. That said security is exempt property.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) move(s) this Honorable Court to order the avoidance of the above lien/judgment.

RESPECTFULLY SUBMITTED,

/s/Karen B. Schneller  
**KAREN B. SCHNELLER, MSB # 6558**  
**ALLEN CHERN LAW, LLC**  
**126 NORTH SPRING STREET**  
**POST OFFICE BOX 417**  
**HOLLY SPRINGS, MISSISSIPPI 38635**  
**(662) 252-3224/karen.schneller@gmail.com**

**CERTIFICATE OF SERVICE**

I, Karen B. Schneller/Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day mailed, via electronic delivery or postage prepaid, a true and correct copy of the above and foregoing Motion To Avoid Lien to:

Tower Loan of Horn Lake  
Post Office Box 68  
Horn Lake, MS 38637

Jeffrey A. Levingston, Esq.  
Chapter 7 Trustee  
Post Office Box 1327  
Cleveland, MS 38732

U. S. Trustee  
501 East Court Street, Suite 6-430  
Jackson, Mississippi 39201

This the 11<sup>th</sup> day of May, 2018

/s/Karen B. Schneller  
KAREN B. SCHNELLER